

REMARKS

I. Introduction

In response to the Office Action dated July 5, 2007, claims 1, 6 and 11 have been amended. Claims 1-15 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Claim Objections

On page (3) of the Office Action, claims 1-15 were objected to because of certain informalities. Applicants' attorney has made amendments to the claims as indicated above to overcome these objections.

III. Drawings

On page (3) of the Office Action, it was indicated that Figures 1 and 2 should be designated with the label "Prior Art," because it is alleged that only that which is old is illustrated.

Applicants' attorney respectfully traverses this requirement by noting that the Sheet Set Manager of the present invention is implemented in the application program 108 (and may be implemented in the operating system 108), and that this functionality is new. Applicants' attorney notes that this new functionality comprising the Sheet Set Manager of the present invention is discussed in conjunction with Figures 1 and 2, and thus Figures 1 and 2 are not illustrating the prior art. Consequently, Applicants' attorney requests that this requirement be withdrawn.

IV. Prior Art Rejections

A. The Office Action Rejections

On pages (4)-(7) of the Office Action, claims 1, 2, 5-7, 10-12 and 15 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Bonney et al., U.S. Patent 6,339,439 (Bonney) and Workman et al., U.S. Publication 2004/0236754 (Workman). On pages (7)-(9) of the Office Action, claims 3, 4, 8, 9, 13 and 14 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Bonney, Workman and Haddad, U.S. Publication 2002/0111928 (Haddad).

Applicants' attorney respectfully traverses these rejections.

B. The Applicants' Independent Claims

Independent claims 1, 6 and 11 are generally directed to operating a graphics program in a computer. Claim 1 is representative and recites the step of performing one or more functions of a Sheet Set Manager in the graphics program, wherein the Sheet Set Manager manages one or more Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein, and the Sheet Set Manager publishes the Sheet Sets, the Subsets of the Sheet Sets and the Sheets.

C. The Bonney Reference

Bonney describes an information display device capable of displaying logical display planes includes a first part for storing items of display plane forming information respectively defined for the logical display planes, and a second part for displaying the logical display planes on a screen part in accordance with the items of the display plane forming information, wherein the items of the display plane forming information of logical display planes that have a hierarchical relationship include information describing the hierarchical relationship and commonly own attribute information concerning a component commonly used in the logical display planes having the hierarchical relationship.

D. The Workman Reference

Workman describes a method of maintaining a bidirectional link between data in a file checked-out from a content management system to a user computer and data in at least one file maintained at the content management system is provided. In the method, a first file is scanned at least when it is one of checked in and checked out of the document management system to locate a link in the file. Information is gathered from the first file regarding a source and target of the link. It is determined if an element in the file is the source or the target. The information is the stored in a database. The information in the database is automatically updated when a second file is corresponding to the other end of the link is checked in to the document management system to

reflect changes made to the end of the link in the second file. The changes are applied to the information in the first file.

E. The Haddad Reference

Haddad describes a system for producing and distributing printed documents. The documents to be produced are classified into one or more document sets. The documents, and associated document processing information is then transmitted to a third party for production. The documents may then be delivered to one or more desired recipients. The documents are classified into document sets according to the document processing information, which may include production parameters, such as, format and media requirements like paper size and ink color. The document processing information can also include information relating to the recipients or production parties, such as printing, billing and delivery specifications.

F. The Applicants' Invention is Patentable Over the References

The Applicants' invention, as recited in amended independent claims 1, 6 and 13, is patentable over the combination of Bonney and Workman, as well as the combination of Bonney, Workman and Haddad, because it recites a specific combination of elements not shown by the references.

The Office Action, on the other hand, asserts that all the elements of the independent claims are shown in the combination of Bonney and Workman. However, when placed in context, the combination of Bonney and Workman teach something different than Applicants' invention.

1. **Bonney does not describe a Sheet Set Manager.**

The Office Action asserts that Bonney teaches a CAD program capable of performing the functions of a Sheet Set Manager. At the locations indicated by the Office Action, however, Bonney merely describes drawings generally, where a drawing may include views and may be comprised of multiple sheets.

Bonney does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as

the Subsets of the Sheet Sets that show the Sheets contained therein.

Indeed, there is no recognition in Bonney of the concept of Sheet Sets or Subsets of Sheet Sets, as those terms are defined in Applicants' claims and specification.

2. Workman does not describe a publishing a Sheet Set.

The Office Action admits that Bonney does not teach publishing a Sheet Set, but asserts that Workman does teach these claim elements. At the locations indicated by the Office Action, however, Workman merely describes publishing as comprising plotting or printing drawings generally.

Workman, like Bonney, does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein.

Indeed, like Bonney, there is no recognition in Workman of the concept of Sheet Sets or Subsets of Sheet Sets, as those terms are defined in Applicants' claims and specification.

3. Haddad does not overcome the deficiencies of Bonney and Workman.

Recall that Haddad was cited only against dependent claims 3, 4, 8, 9, 13 and 14, and only for teaching the editing of print parameters.

However, Haddad, like Bonney and Workman, does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein.

4. Summary.

In summary, Applicants' attorney submits that independent claims 1, 6 and 11 are allowable over Bonney, Workman and Haddad. Further, dependent claims 2-5, 7-10 and 12-15 are submitted

to be allowable over Bonney, Workman and Haddad in the same manner, because they are dependent on independent claims 1, 6, and 11, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5, 7-10 and 12-15 recite additional novel elements not shown by Bonney, Workman and Haddad.

V. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.


Respectfully submitted,

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